

The Grace Building  
1114 Avenue of the Americas  
New York, NY 10036-7703  
t 212 775 8700 f 212 775 8800

May 23, 2016

direct dial 212 775 8750  
jschachter@kilpatricktownsend.com

**BY ECF**

Hon. J. Paul Oetken  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Manchanda v. Google, Yahoo, Microsoft, 16-cv-03350 (JPO)(JCF)*

Dear Judge Oetken:

We are counsel for Yahoo in the above captioned matter. We write to object to Plaintiff's "Reply Affidavit To Yahoo['s] Motion to Dismiss" filed on May 21 (Dkt. No. 30) (the "Second Reply").

Yahoo filed its Motion to Dismiss on May 12 (Dkt. No. 20). Plaintiff served Yahoo with his response to that motion the next day (the "First Reply"). In addition to emailing the First Reply to the undersigned with a colorful message (*see* **Exhibit A**), Plaintiff filed it three different times, specifically identifying it as an opposition to Yahoo's Motion to Dismiss each time (*see* Dkt. Nos. 21-23). In his First Reply, Plaintiff falsely accuses Yahoo, its counsel, co-defendants, and co-defendants' counsel of engaging in discriminatory conduct.

Several days later, on May 17, Plaintiff filed a Motion for Contempt (Dkt. No. 26), in which he once again falsely accuses Defendants and their counsel of discriminatory conduct, and asks the Court to sanction Defendants for \$100 million dollars (Dkt. No. 26).

Pursuant to Local Civil Rule 6.1, Yahoo's response to Plaintiff's First Reply was due today, and was timely filed (Dkt. No. 31). On Saturday, May 21 (*i.e.* two days ago), Plaintiff filed the Second Reply. In the Second Reply Plaintiff yet again opposes Yahoo's Motion to Dismiss and makes false accusations about Defendants and their counsel. Having already had ample opportunity to oppose Yahoo's Motion to Dismiss, and having already opposed it, albeit incoherently, in multiple filings with the Court, Yahoo should not be forced to respond to yet another opposition.

Hon. J. Paul Oetken  
May 23, 2016  
Page 2

Accordingly, Yahoo objects to Plaintiff's Second Reply, and respectfully requests that the Court not consider it in considering Yahoo's Motion to Dismiss. If the Court should deny our objection, we ask that the Court order Plaintiff to cease his filing activity (he even filed one in the midst of our writing this letter (Dkt. No. 32) and set a date for Yahoo to respond to all of Plaintiff's baseless claims at once.

Respectfully submitted,

/s/ Jeremy A. Schachter

Jeremy A. Schachter

# EXHIBIT A

From: [RAHUL MANCHANDA ESQ](#)  
To: [Schachter, Jeremy](#)  
Cc: [Wilson, Dennis](#); [Barbee, Carrie](#); [1009743 - MANCHANDA V. YAHOO!](#); [Kramer, David](#); [rgoldstein@orrick.com](#)  
Subject: Re: Manchanda v. Google et al.  
Date: Friday, May 13, 2016 1:54:50 AM  
Attachments: [COURT ORDER UPLOADED.pdf](#)  
[REPLY AFFIDAVIT UPLOADED.pdf](#)

---

Please see the attached.

Go fuck yourself.

Thanks,

Rahul D. Manchanda, Esq.  
Manchanda Law Office PLLC  
30 Wall Street, 8th Floor  
New York, New York 10005  
Tel: (212) 968-8600  
Mob: (646) 645-0993  
Fax: (212) 968-8601  
Toll Free 24 Hour Hotline: (855) 207-7660

e-mail: [rdm@manchanda-law.com](mailto:rdm@manchanda-law.com)  
web: [http://www.manchanda-law.com/MT\\_Rahul.html](http://www.manchanda-law.com/MT_Rahul.html)

Ranked amongst Top Attorneys in the United States by Newsweek Magazine in 2012 and 2013.

Licensed New York State Real Estate Broker

CLIENT TESTIMONIALS: <http://www.manchanda-law.com/ClientTestimonials.html>

BOOK CONSULTATION ONLINE AT  
<https://squareup.com/appointments/book/YUJAEI/manchanda-law-office-pllc>

This electronic transmission is both personal and confidential, and contains privileged information intended only for the use of the individual or entity named above. If the reader is not the intended recipient, you are hereby notified that any dissemination or copying of this transmission is strictly prohibited. If there are any problems with this transmission, or you have received it in error, please immediately notify us by telephone and return the original transmission to us at the above address via the U.S. Postal Service.

Attention: All foreign nationals (permanent residents and children included) are required to report any change in address within ten (10) days to the USCIS using Form AR-11. Foreign nationals must report address changes to the USCIS by completing this form and sending it to the USCIS. The form can be obtained from the USCIS website at: <http://www.uscis.gov/files/form/ar-11.pdf>. Please also notify our office of your new address.

Download our Immigration Law Firm Brochure at <http://manchanda-law.com/MLO%20IMMIGRATION%20LAW%20BROCHURE.pdf>

On 5/12/2016 11:08 PM, Schachter, Jeremy wrote:

Mr. Manchanda,

Please see the attached. Thank you.



**Jeremy A. Schachter**

**Kilpatrick Townsend & Stockton LLP**

The Grace Building | 1114 Avenue of the Americas | New York, NY 10036-7703

office 212 775 8750 | fax 212 656 1654

[jschachter@kilpatricktownsend.com](mailto:jschachter@kilpatricktownsend.com) | [My Profile](#) | [vCard](#)

---

Confidentiality Notice:

This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 U.S.C. Section 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This transmission, and any attachments, may contain confidential attorney-client privileged information and attorney work product. If you are not the intended recipient, any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. Please contact us immediately by return e-mail or at 404 815 6500, and destroy the original transmission and its attachments without reading or saving in any manner.

---

\*\*\*DISCLAIMER\*\*\* Per Treasury Department Circular 230: Any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.